

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION  
1:12-CV-895

THEODORE HOWARD,  
Plaintiff *pro se*,

vs.

GE MONEY, SMITH DEBNAM NARRON  
DRAKE SAINTS & MYERS LLP,  
Defendants.

DEFENDANTS' PROPOSED  
DISCOVERY PLAN  
Fed.R.Civ.P. 26(f)  
L.R.16.1(b)

NOW COME the defendants, by and through the undersigned counsel, and submit this proposed discovery plan for the court's consideration at the preliminary pretrial conference scheduled for October 29, 2012.

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.1, a preliminary pretrial conference is scheduled for October 29, 2012. Bettie Kelley Sousa, the undersigned attorney, intends to appear for the defendants.

At the request of the court, the defendants propose the following discovery plan:

Case-Management Track:

The defendants propose that the appropriate plan for this case (with any stipulated modifications to be determined) is that designated in L.R.26.1 as: Standard.

Limitations:

1. Discovery will be needed on the following subjects:  
all claims and defenses raised in the pleadings.

2. A maximum of fifty (50) interrogatories shall be served by the plaintiff and by the defendants.

3. A maximum of fifty (50) requests for admissions shall be served by the plaintiff and by the defendants.

4. A maximum of five (5) depositions shall be taken by the plaintiff, and a maximum of five (5) depositions shall be taken by the defendants.

5. All discovery will be commenced in time to be completed by February 15, 2013.

Supplementations.

6. Supplementations under Rule 26(e) are due at least thirty (30) days after it becomes apparent that in good faith a response should be supplemented on a material fact or to avoid misleading the opposing party.

Other Deadlines.

7. The defendants do not request a further conference with the court before entry of the scheduling order.

8. The parties should be allowed until December 1, 2012 in which to request leave to join additional parties.

9. All potentially dispositive motions should be filed by March 1, 2013.

10. The parties request a pretrial conference on or about March 15, 2013.

11. If not sooner resolved, the case should be ready for trial by May 1, 2013, and should take approximately one (1) day to try.

Other.

12. This case does not need early judicial intervention due to complexity or other factors.

13. The defendants request that, in the event that a matter needs immediate or shortened disclosure or notice, their counsel be allowed to contact the clerk's office to contact the plaintiff, due to the plaintiff not being registered for CM/ECF.

Dated October 25, 2012.

/s/Bettie Kelley Sousa\_\_\_\_\_  
Bettie Kelley Sousa  
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Smith Debnam Narron Drake  
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THEODORE HOWARD,	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. 1:12-CV-895
	)	
GE MONEY, SMITH DEBNAM NARRON	)	
DRAKE SAINTS & MYERS LLP,	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the all persons who have made an appearance in the case, and I hereby certify that I have mailed the document to the plaintiff, whom I believe to be a non CM/ECF participant:

Theodore Howard  
2359 James Boswell Road  
Burlington, NC 27217

This the 25th day of October, 2012.

**/s/Bettie Kelley Sousa**

Bar Number: NC 9902  
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